

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

CHARLES CANDELARIA FARRULLA

Debtor(s)

Case No: 11-02894 ESL

Chapter 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to increase the base of the plan.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 20th day of July of 2011.

JPC LAW OFFICE

Jose M Prieto Carballo, Esq
P.O. Box 363565
San Juan, P.R. 00936-3565
Tel (787) 607-2066 & Tel (787) 607-2166
jpc@jpclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 11-02894-13

CANDELARIA FARRULLA, CHARLES

Debtor(s)

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☒ AMENDED PLAN DATED: 7/20/2011

☐ PRE ☐ POST-CONFIRMATION

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$	100.00	x	18	= \$	1,800.00
\$	200.00	x	42	= \$	8,400.00
\$		x		= \$	
\$		x		= \$	
\$		x		= \$	

TOTAL: \$ 10,200.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 10,200.00

**III. ATTORNEY'S FEES
(Treated as § 507 Priorities)**

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ 2,444.00

Signed: /s/ CHARLES CANDELARIA FARRULLA
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. FIRST BANK OF PR	Cr. FIRST BANK OF PR	Cr. See Attached
# 4160-000-192-615	# 4160000278214	# _____
\$ <u>750.00</u>	\$ <u>35.00</u>	\$ _____

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

FIRST BANK OF PR	FIRST BANK OF PR	See Attached
------------------	------------------	--------------

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____
☐ Paid 100% / ☐ Other: _____

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
See Continuation Sheet

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Debtor(s)

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 2 of 2

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

DEBTOR REJECTS LEASE WITH BMW FINANCIAL

DEBTOR LIFT THE STAY IN FAVOR OF BPPR CLAIM 5-1

DEBTOR TO MANTAIN REGULAR PAYMENT TO FIRSTBANK 4 MORTGAGES

Debtor(s)

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 2

	Cr	#	\$
Trustee pays secured ARREARS:	FIRST BANK OF PR	4160000192616	35.00
	First Federal Savings	4160-000-280-683	35.00
Debtor Otherwise maintains regular payments directly to:	FIRST BANK OF PR		
	First Federal Savings		
Executory Contracts - Rejected:	BPPR		

Label Matrix for local noticing
0104-3
Case 11-02894-ESL13
District of Puerto Rico
Old San Juan
Thu May 5 13:01:53 AST 2011

BPPR
P O BOX 366818
SAN JUAN, PR 00936-6818

FIRST BANK OF PR
FIA CARD SERVICES
P O BOX 15026
WILMINGTON, DE 19850-5026

PRTC COQUI NET
P O BOX 70366
SAN JUAN, PR 00936-8366

JOSE M PRIETO CARBALLO
JPC LAW OFFICE
PO BOX 363565
SAN JUAN, PR 00936-3565

US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

(p)BMW FINANCIAL SERVICES
CUSTOMER SERVICE CENTER
PO BOX 3608
DUBLIN OH 43016-0306

FIRST BANK OF PR
P O BOX 19327
SAN JUAN, PR 00910-1327

XEROX CORP
P O BOX 650361
DALLAS, TX 75265-0361

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

BANCO SANTANDER
P O BOX 362589
SAN JUAN, PR 00936-2589

COSTCO WHOLESALE
P O BOX 34331
SEATTLE, WA 98124-1331

First Federal Savings
Ponce De Leon Av Stop 23
San Juan, PR 00901

CHARLES CANDELARIA FARRULLA
P O BOX 40704
SAN JUAN, PR 00940-0704

MONSITA LECAROS ARIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bmw Financial Services
PO Box 3608
Dublin, OH 43017

End of Label Matrix
Mailable recipients 14
Bypassed recipients 0
Total 14